

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, Administrator, et al.,	)	
	)	
Plaintiffs,	)	
vs.	)	C.A. No. 04-312-L
	)	
JEFFREY DERDERIAN, et al.,	)	
	)	
Defendants.	)	
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ESTATE OF JUDE B. HENAULT, et al.,	)	
	)	
Plaintiffs,	)	
vs.	)	C.A. No. 03-483-L
	)	
AMERICAN FOAM CORPORATION, et al.,	)	
	)	
Defendants.	)	

**MOTION TO APPROVE SETTLEMENT PURSUANT TO**  
**R.I. GEN. LAWS §§ 10-6-7, 10-6-8 ON BEHALF OF**  
**SEALED AIR CORPORATION AND SEALED AIR CORPORATION (US)**

SEALED AIR CORPORATION and SEALED AIR CORPORATION (US) (collectively “the Sealed Air Defendants”), hereby move this Court for an Order approving their settlement with plaintiffs in the amount of \$25,000,000 (twenty-five million dollars) as a “good faith” settlement in accordance with R.I. Gen. Laws §§ 10-6-7, 10-6-8, in order to extinguish all potential contribution claims by joint tortfeasors.

The Sealed Air Defendants further request that the Order approving the settlement be without prejudice to their ability to address the Court’s review of the individual settlements allotted to the minor plaintiffs under Special Master McGovern’s Plan of Distribution and/or appointments of guardians ad litem and/or a special master in connection therewith. Court approval of this Motion is one of a number of conditions precedent that have to be satisfied before there is a final, binding settlement.

In support of their Motion, the Sealed Air Defendants submit the accompanying Memorandum of Law and Affidavit of William P. Pistorius, the contents of which are incorporated by reference in this Motion.

/s/ William P. Pistorius

William P. Pistorius  
ARDC No. 6196117  
Clausen Miller P.C.  
10 South LaSalle Street  
Chicago, Illinois 60603  
Tel.# (312) 855-1010  
Fax # (312) 606-7777  
Email: wpistorius@clausen.com

/s/ Scott M. Carroll

Scott M. Carroll  
R.I. Bar No. 7624  
Boyle, Morrissey & Campo, P.C.  
695 Atlantic Avenue  
Boston, MA 02111  
Tel.# (617) 451-2000  
Fax # (617) 451-5775  
Email: scarroll@bmcattorneys.com